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June 16, 1999

Dockets Management Branch (HFA-305)
Food and Drug Administration
Department of Health and Human Services
Room 1-23
12420 Parklawn Drive
Rockville, MD 20857

RE: Citizen Petition to Amend the Peanut Spread Regulation (21 CFR 102.23)

Dear Sir or Madam:

The American Peanut Shellers Association is an association of commercial peanut shellers in the United States. Our members handle approximately 65% of the peanuts used in the United States for edible purposes and approximately 90% of the peanuts exported from the United States for edible purposes.

Our Association has been made aware of the filing of the above petition by the Procter & Gamble Company, Best Foods and Hunt-Wesson, Inc. The petitioners have been gracious enough to furnish us a copy of the petition. Our Board of Directors has reviewed the petition and voted unanimously to support the position taken by the petitioners.

It is our Association view that the peanut industry and the consuming public will be better served with regulations that encourage and accommodate innovation and creativity in producing new and better products for the public. Consequently, we urge you to view the petition favorably.

If the Association can be of service to you with regard to this matter or any others, please do not hesitate to call.

Very truly yours,

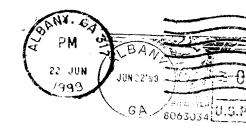
John T. Powell Executive Director

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